

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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PAUL D. CEGLIA,

Civil Action No. : 1:10-cv-00569-RJA

Plaintiff,

v.

MARK ELLIOT ZUCKERBERG, Individually, and  
FACEBOOK, INC.

Defendants.

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**DECLARATION**  
**OF DEAN BOLAND IN SUPPORT**  
**OF MOTION FOR SANCTIONS**  
**FOR SPOILIATION BY**  
**DEFENDANTS**

DEAN BOLAND, submits this declaration in support of Plaintiff's Motion for Sanctions for Spoliation by Defendants and hereby declares under penalty of perjury and pursuant to 28 U.S.C. 1746 that the following is true and correct:

1. I make this declaration upon personal knowledge.
2. I am counsel for Paul D. Ceglia in this matter.
3. Paul Osborn is a document examination expert hired by Plaintiff in this matter.
4. I communicated with Mr. Osborn and requested he produce a copy of all reference images of any contracts involved in this matter directly to Defendants.
5. Paul Osborn produced copies of all reference images of the Facebook Contract directly to Defendants via FEDEX on October 27, 2011 as confirmed by Defense Counsel Alex Southwell in an email to me that day.

6. I am not aware of Mr. Osborn having any additional images of any type relative to any court order in this matter that have not been copied and produced to Defendants.
7. I have not flown to Mr. Osborn's office to inspect his computer and confirm that he copied onto CD all the reference images on his computer as part of his October 27, 2011 production.
8. Osborn's images appearing in Plaintiff's Motion for Sanctions for Spoliation of Evidence by Defendants have been produced to Defendants.
9. Valery Aginsky is a document examination expert hired by Plaintiff in this matter.
10. Before my filing of a notice of appearance on Mr. Ceglia's behalf in this matter, it is my understanding that Mr. Aginsky produced copies of his reference images of the Facebook Contract to Defendants.
11. Aginsky's images appearing in Plaintiff's Motion for Sanctions for Spoliation of Evidence by Defendants have been produced to Defendants.
12. Kevin Cross was once counsel for Mr. Ceglia.
13. I communicated to Mr. Cross a request that he produce a copy of all reference images of the Facebook Contract in his possession.
14. All reference images captured by Kevin Cross of the Facebook Contract have been produced to Defendants via email and a request of Mr. Cross is being processed to have those images produced to Defendants on CD as well.
15. Kevin Cross's images appearing in Plaintiff's Motion for Sanctions for

Spoliation of Evidence by Defendants have been produced to Defendants.

16. Larry Stewart is a document examination expert hired by Paul Ceglia.
17. I requested of Mr. Stewart that he provide Defendants a copy of all reference images of any contract involved in this matter.
18. Defense Counsel Southwell confirmed receipt of that production on October 27, 2011 via email.
19. Larry Stewart's images appearing in Plaintiff's Motion for Sanctions for Spoliation of Evidence by Defendants have been produced to Defendants.

I hereby and hereby declare under penalty of perjury and pursuant to 28 U.S.C. 1746 that the above declaration is true and correct:

DATED: November 1, 2011.

/s/ Dean Boland

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Dean Boland, Declarant